



**CONNOLLY BOVE LODGE & HUTZ LLP**

ATTORNEYS AT LAW

The Nemours Building  
1007 North Orange Street  
P.O. Box 2207  
Wilmington DE 19899  
TEL (302) 658 9141  
FAX (302) 658 5614

1990 M Street, NW, Suite 800  
Washington DC 20036  
TEL (202) 331 7111  
FAX (202) 293 6229

WEB [www.cblh.com](http://www.cblh.com)

Francis DiGiovanni  
Partner

TEL (302) 888-6316  
FAX (302) 658-5614  
EMAIL [fdigiovanni@cblh.com](mailto:fdigiovanni@cblh.com)  
REPLY TO Wilmington Office

August 9, 2005

**VIA ELECTRONIC FILING**

The Honorable Gregory M. Sleet  
United States District Court  
for the District of Delaware  
844 N. King Street  
Room 2124, Lockbox 19  
Wilmington, Delaware 19801

Re: *Dyson Technology Limited et al. v. Maytag Corporation*,  
Civil Action No. 05-434-GMS

Dear Judge Sleet:

The parties have filed, earlier today, a stipulation and proposed order extending the time by which defendant may file its answering brief to plaintiff's motion for preliminary injunction. The stipulation also extends the time by which plaintiff may file its reply brief.

Defendant Maytag respectfully submits that good cause exists for this extension because this is a patent infringement case wherein Maytag has been accused of infringing four Dyson (4) patents relating to vacuum cleaner technology. The patents have a total of 93 claims, 18 of which are being asserted by Dyson in this case. Dyson's opening brief and supporting papers are detailed, voluminous, and will require significant time and effort in order to properly respond to them. Dyson has filed, and heavily relies upon, a 95-paragraph, 28-exhibit, 40-page expert affidavit. (D.I. 14, p. A83). Dyson further relies upon a 40-paragraph, 16-page inventor affidavit. (D.I. 14). Dyson's third affidavit is 26 paragraphs and 11 pages, prepared by a marketing executive. (D.I. 14). Plaintiffs' brief and affidavits include extensive diagrams and technical analysis that obviously required extensive time to prepare. Accordingly, the remaining briefing on plaintiffs' motion for preliminary injunction will require an extension of the briefing schedule provided by the Local Rules, and the stipulation for extension of time is supported by good cause.

Respectfully submitted,



Francis DiGiovanni

FD:dhd

CONNOLLY BOVE LODGE & HUTZ LLP  
ATTORNEYS AT LAW

The Honorable Gregory M. Sleet  
United States District Court  
August 9, 2005  
Page 2 of 2

cc: Clerk of the Court (by electronic filing)  
John W. Shaw, Esquire (by electronic filing and e-mail)  
David B. Tulchin, Esquire (by e-mail)  
410542\_1